Ex. M-M(a)

Pierre Order to Show Cause and related documents

Hulland Funding

How to serve show cause orders

Fields

AFTER THE ORDER IS SIGNED BY THE JUDGE MAKE THREE (3) COPIES OF EACH PAGE.

SAVE ONE (1) SET OF COPIES FOR YOUR RECORDS.

SERVE ONE (1) SET OF COPIES ON THE SHERIFF IN THE MANNER DIRECTED IN THE ORDER. (BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED.)

SERVE ONE (1) SET OF COPIES IN THE PLAINTIFF OR HIS/HER LAWYER IN THE MANNER DIRECTED IN THE ORDER. (BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED.)

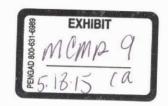
A PERSON OVER THE AGE OF 18 WHO IS NOT A PARTY TO THE ACTION MUST SERVE THE ORDER. THAT PERSON MUST COMPLETE THE ATTACHED AFFIDAVIT OF SERVICE AND SIGN IN FRONT OF A NOTARY PUBLIC OR THE CLERK OF THE COURT.

THE PAPERS MU ORDER.	UST BE SERVED NO.	O LATER THAN	THE DATE INDIC	CATED IN THE
A COPY OF THE	ORDER TO SHOW	CAUSE WITH T	HE COMPLETED	AFFIDAVIT OF
SERVICE MUST	BE RETURNED TO	THE CLERK'S	OFFICE AT LEAS	T THREE(3) DAYS
PRIOR TO THE H	EARING, OR BY TI	HE DATE NOTE	D IN THE	
ORDER	6-13-11			-

YOU ARE NOT REQUIRED TO APPEAR IN COURT ON THE RETURN DATE. ORAL ARGUMENT WILL NOT BE CONSIDERED. YOU WILL RECEIVE THE JUDGE'S DECISION BY MAIL.

PLEASE NOTE

YOU <u>MUST</u> RETURN A COPY OF THE ORDER TO SHOW CAUSE AND THE ORIGINAL <u>COMPLETED</u> AFFIDAVIT OF SERVICE TO THE COURT. IF THESE PAPERS ARE <u>NOT</u> RETURNED BY THE DATE INDICATED, YOUR ORDER TO SHOW CAUSE WILL BE <u>DENIED</u>.



Affidavit of Service

On theday of, 2011 I served the		
Order to Show Cause on <u>Rubin</u> & Rothman		
at 1787 Veteron's Highway P. U. BIX 9003 Islandia ny 11749 and the Sheriff of Suffolk County at 360 Yaphank Ave. Yaphank, NY 11980 by certified mail return receipt requested.		
Sign in presence of Notary NIVER Pierre		
Print Name		
Sworn to Before me on the		
2nd day of June. , 2011		
ELIZABETH M RODRIGUEZ NOTARY PUBLIC. State of New York No 27.455.227 Qualified in Suffolk County Commission Expres March 23 20/4		
dex No. SMC - 29/ 1/20-11		

At a Motion Term of the District Court of the State of New York, County of Suffolk

Hon. JAMES P. FLANAGAN	Judge of the District Court
Midland Funding LLC x Plaintiff Christopher Pierre x Defendant Upon the affidavit of Christopher Pierre May , 2011, and upon all prior	CIVIL ORDER TO SHOW CAUSE Index No. SMC 29/-// ere, sworn to on the 27 day of r papers and proceedings,
Let the plaintiff show cause at a Motion Term of this Co Court of Suffolk County NORTH COUNTY COMPLE HWY, HAUPPAUGE NY 11788 on the day of thereafter as the parties can be heard, why an order should and/or the judgment granted in favor of the plaintiff and set should not have such other and further relief as may be just	X BUILDING #158, VETERANS MEMORIAL , 20//, at 9:00 AM or as soon not be entered vacating the default on appearance date ting the matter down for trial, and why the defendant
Sufficient reason being presented for the relief requested Ordered, that pending the hearing of this motion, the She conducting any proceedings to enforce the judgment, and further ordered, that the defendant serve a copy of this order on 187 Vets. New and the Sheriff of Suffolk County at 360 Yaphank Avenue receipt requested by the 116 day of	eriff and the plaintiff and all his agents are stayed from
All papers the plaintiff desires to submit in opposition to and forwarded to the court prior to the hearing date. No perstatements will be considered.	
Order signed at HAUPPAUGE, N.Y. Date 5-31-1(THIS ORDER TOGETHER WITH PROOF OF SERVICE MUST BE RETURNED TO THE CLERK'S OFFICE BY 6-13-11	Ebter, HON. JAMES P. FLANAGAN

SUFFOLK GOUNT 113 TRICT COURT 2011 HAY 23 AM 11: 16

te of New York	Affidavit in support of motion to vacate default judgment
trict Court of the County of Suffolk RTH District held at HAUPPAUGE, N.Y.	
Midland Funding	Index No. SMC 291-11
Christopher Pierre Defendant (s) Christopher Pierre	
I am the defendant(s) in the above entitled That I reside at 25 Audubon	
That this is an action for Wew Yur	K
That on the 3 day of MAY by this court.	, 20 a default judgment was entere
That the defendant(s) did not appear becaus	e: (State reason)
Sec attached	
No previous application for this relief has	been made.
Wherefore, deponent respectfully requests an 3 day of May 2011	order vacating the judgment entered on the , or such further relief as may be just and
Sworn to before me the	Defendant (s)
27 day of May 2011	
Notary Public, State of New York	
CLERK	

DC-219

Christopher Pierre 25 Audubon Ave Holbrook, NY 11741

May 26, 2011

I, Christopher Pierre residing at 25 Audubon Avenue, Holbrook, NY am the defendant in this action in the State of New York. I am now aware that on May 3, 2011 a default judgment was entered by this court. I apologize for my non-appearance in court on that day, as I was led to believe by Storm, McIntosh, Representative for Plaintiff Attorneys Rubin and Rothman, that my appearance in court was not necessary as per our conversation on January 21, 2011.

Ms. Mcintosh advised there was no need for me to appear in court since we had an settlement agreement and payment schedule in place. (Exhibit A) Said agreement was reached on December 15, 2010. I promptly began monthly payments of \$100 on January 10, 2011 and thereafter on February 10, 2011 and March 10, 2011.

Upon making all three payments promptly another settlement (Exhibit B) was agreed upon with a down payment of \$250 and monthly payments thereafter again of \$100 until the balance paid in full or unless otherwise negotiated.

The Plaintiff's representative assured me that since I was making monthly payments, there would not be a judgment filed in this matter. I believed this to be true.

I would like the court to take into consideration the fact that my wife was laid-off from her job and unemployed for 15 months, creating a severe hardship for my family. Our family home was in foreclosure proceedings and thankfully my wife found gainful employment and with the help of our local U.S. Congressman, Timothy Bishop, we were able to obtain a loan modification and are currently out of foreclosure status.

As our family starts to repay all our outstanding debts and judgments we are diligently trying to repay all our creditors. We ask that the court consider our request for an Order to Show Cause and have the ability to negotiate a fair settlement agreement and repayment plan with Rubin & Rothman and I agree to appear at any and all proceedings in this matter.

Christopher Pierre

NEW JERSEY OFFICE: 190 NORTH AVENUE EAST P.O. BOX 8 CRANFORD, N.J. 07016 L TEL (908) 931-0017 FAX (908) 931-0660

MARY LACOSTE DIRECTOR OF OPERATIONS

ATTORNEYS AT LAW 1787 VETERANS HIGHWAY SUITE 32 P.O. BOX 9003 ISLANDIA, N.Y. 11749 TEL (631) 234-1500

FAX (631) 234-1138

NYC DCA LIC. 1249720 ** USE 1-631-930-0591 **

December 8, 2010

#BWNNWGC #D130 9143 5610 C082# CHRIS PIERRE 25 AUDUBON AVE HOLBROOK, NY 11741

CE

JOSEPH RUBIN (1927-1994) KEITH H. ROTHMAN' KATHRYN N. ANDREOLLI1.2 MARK BRAVERMAN SHARI. BRAVERMAN' JOSEPH LATONA1 SUBY MATHEW' ERIC S. PILLISCHER' ANGELO L. SIRAGUSA1 VALERIE E. WATTS DIANA K. ZOLLNER²

MEMBER N.Y. BAR MEMBER N.J. BAR

X REPLY TO N.Y. OFFICE REPLY TO N.J. OFFICE

CURRENT CREDITOR: MIDLAND FUNDING LLC DOING-BUSINESS - - - - -

IN NY AS MIDLAND FUNDING OF

DELAWARE LLC

ORIGINAL CREDITOR: CHASE BANK USA, N.A.

AMOUNT OF DEBT: \$6,985.69

OUR FILE NO: 914356

Dear Sir/Madam,

As of the date of this letter, the creditor has a claim against you in the above amount. We must ask you to contact us to discuss payment in full of the debt or a payment arrangement.

SEYS 101 Hece

1/21

UNLESS YOU DISPUTE THE VALIDITY OF THE DEBT, OR ANY PORTION THEREOF, WITHIN 30 DAYS AFTER YOUR RECEIPT OF THIS LETTER, WE WILL ASSUME AGAIN THE DEBT TO BE VALID. IF YOU NOTIFY US IN WRITING WITHIN THE 30 DAY PERIOD THAT THE DEBT, OR ANY PORTION THEREOF, IS DISPUTED, WE WILL OBTAIN VERIFICATION OF THE DEBT OR A COPY OF A JUDGMENT AGAINST YOU AND MAIL A COPY OF SUCH VERIFICATION TO YOU. UPON YOUR WRITTEN REQUEST WITHIN THE 30 DAY PERIOD, WE WILL PROVIDE YOU WITH THE NAME AND ADDRESS OF THE ORIGINAL CREDITOR, IF DIFFERENT FROM THE CURRENT CREDITOR.

MIGHTH M

for All checks should be sent to P.O. Box 550, Islandia, New York 11749, payable to Rubin and Rothman, and refer to our file number 914356

is the property than the second of 1000000 to 110000 to 11000 to 11000 to 1100000.

In addition to personal checks, we accept WESTERN UNION and electronic payments. You can make electronic payments by calling us during office hours, online at RRLLC189.com or by calling 1-866-826-2576 after office hours.

WE ARE ATTEMPTING TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE. THIS COMMUNICATION IS FROM A DEBT COLLECTOR.

AT THIS TIME, NO ATTORNEY WITH THIS FIRM HAS PERSONALLY REVIEWED THE PARTICULAR CIRCUMSTANCES OF YOUR ACCOUNT.

RUBIN & ROTHMAN, LLC

Islandia, N.Y. 11749 TEL (631) 234-1500

EXTENSION # 174 NYC DCA LIC. 1249720

December 15, 2010

8

CHRIS PIERRE 25 AUDUBON AVE HOLBROOK, NY 11741

OUR FILE NO: 914356

CURRENT CREDITOR: MIDLAND FUNDING LLC DOING BUSINESS

IN NY AS MIDLAND FUNDING OF

DELAWARE LLC

ORIGINAL CREDITOR: CHASE BANK USA, N.A.

Dear Sir/Madam,

Enclosed please find two copies of a stipulation of settlement to be signed by you. Kindly return one copy of the stipulation in the enclosed envelope and keep the other copy for your records.

All checks should be sent to P.O. Box 550, Islandia, New York 11749, payable to RUBIN & ROTHMAN, as attorneys, and refer to file# 0914356.

In addition to personal checks, we accept WESTERN UNION and electronic payments. You can make electronic payments by calling us during office hours, online at RRLLC189.com or by calling 1-866-826-2576 after office hours.

If the signed stipulation is not returned to us we will proceed with collection activity.

RUBIN & ROTHMAN

AGREEMENT CONCLUDED BY: STORM MCINTOSH

EXT 174

NATALIE FRIEDMAN ATTORNEY-AT-LAW

WE ARE ATTEMPTING TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE. THIS COMMUNICATION IS FROM A DEBT COLLECTOR.

Enclosure

Between

CREDITOR:

MIDLAND FUNDING LLC DOING BUSINESS

IN NY AS MIDLAND FUNDING OF

DELAWARE LLC

And

DEBTOR:

CHRIS PIERRE

IT IS HEREBY STIPULATED AND AGREED by and between the debtor(s) and the attorneys for the creditor as follows:

1. Debtor(s) hereby acknowledge(s) that they are indebted to the creditor in the sum of \$ 6,997.74, and that they have no offset to this claim or any counterclaim that may be brought against the creditor.

2. Debtor(s) agree(s) to pay creditor the sum of \$ 6,997.74, together with interest at the rate of 9.000% per annum on the principal 6,980.53 from 12/15/10 as follows: balance of \$

100.00 on 1/10/11.

a. \$ b. \$ 100.00 on 2/10/11 and continuing monthly for 1 months thereafter at which time the entire settlement balance is due, unless otherwise renegotiated.

3. All checks should be sent to P.O. Box 550, Islandia, New York 11749 payable to RUBIN & ROTHMAN, as attorneys, and refer to file# 0914356.

4. Notwithstanding this stipulation, the debtor(s) understand that the creditor may at its sole discretion bring suit and enter judgment against them for the full amount due on this claim, including any interest, costs, disbursements and attorney's fees awarded by the court, crediting the debtor(s) with any payments made hereunder. Court costs and process server fees incurred in any future lawsuit will be added to the above balance. In the event that judgment is entered against the debtor(s), they agree to pay the amount of the judgment, together with interest at the rate of 9% per annum, in lieu of the aforesaid sum. The creditor will not enforce the judgment as long as payments are made in accordance with the terms of this stipulation. No representation has been made to the debtor(s) about whether the creditor will or will not bring suit against The above payments are the minimum amount due each month.

5. Upon payment by the debtor(s) in accordance with the terms of this stipulation, the creditor will issue a letter to debtor confirming that the matter was resolved if no lawsuit was brought. If the creditor commences a lawsuit, the creditor will notify the court that the case was settled or action discontinued. If a judgment was entered, the creditor will issue a satisfaction of judgment. Debtor(s) waive any cease and desist request.

Islandia, New York Dated:

12/15/2010

RUBIN & ROTHMAN, LLC Attorneys for Creditor

CHRIS PIERRE

WE ARE ATTEMPTING TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE. THIS COMMUNICATION IS FROM A DEBT COLLECTOR. DO NOT FILE NYC DCA LIC. 1249720

Islandia, N.Y. 11749 TEL (631) 234-1500

EXTENSION # 174 NYC DCA LIC. 1249720

March 15, 2011

CHRIS PIERRE 25 AUDUBON AVE HOLBROOK, NY 11741

OUR FILE NO: 0914356

CURRENT CREDITOR: MIDLAND FUNDING LLC DOING BUSINESS

IN NY AS MIDLAND FUNDING OF

DELAWARE LLC

ORIGINAL CREDITOR: CHASE BANK USA, N.A.

Dear Sir/Madam,

1 -11

Enclosed please find two copies of a stipulation of settlement to be signed by you. Kindly return one copy of the stipulation in the enclosed envelope and keep the other copy for your records.

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In addition to personal checks, we accept WESTERN UNION and electronic payments. You can make electronic payments by calling us during office hours, online at RRLLC189.com or by calling 1-866-826-2576 after office hours.

If the signed stipulation is not returned to us we will proceed with collection activity.

RUBIN & ROTHMAN

AGREEMENT CONCLUDED BY: STORM MCINTOSH EXT 174

Enclosure

WE ARE ATTEMPTING TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE. THIS COMMUNICATION IS FROM A DEBT COLLECTOR.

5/26/2011

Untitled Document

Chase Online

TOTAL CHECKING (...1182)

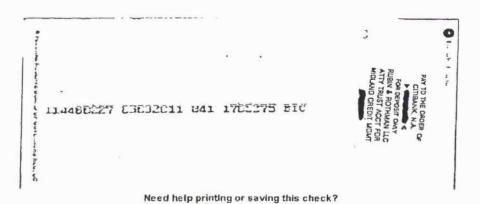
Check Number: 1860

Post Date: 05/09/2011

Amount of Check: \$100.00

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5/26/2011

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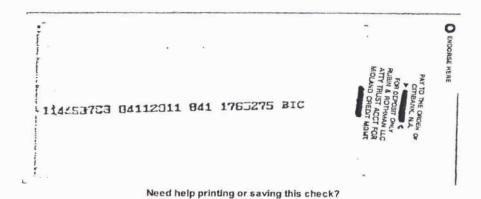
Check Number: 1853

Post Date: 04/12/2011

Amount of Check: \$250.00

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5/26/2011

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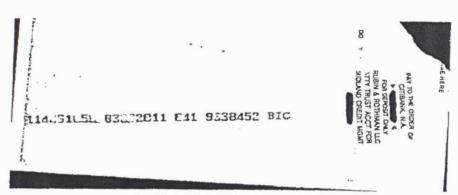
Check Number: 1840

Post Date: 03/08/2011

Amount of Check: \$100.00

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FOURTH DISTRICT COURT NORTH COUNTY COMPLEX BLDG. #. 158 VETERANS MEMORIAL HWY HAUPPAUGE, NEW YORK 11788-3211 PHONE (631) -853-5400 FAX (631) 853-5951

21.30pm - 3pm. Index: SMC 291-11

CALL TO ASK IF YOUR ORDER TO SHOW CAUSE HAS BEEN SIGNED

: DLAND FUNDING LLC DOING BUSINESS

C: NY AS MIDLAND FUNDING OF

DELAWARE LLC

And

DEBTOR:

CHRIS PIERRB

IT IS HEREBY STIPULATED AND AGREED by and between the debtor(s) and the attorneys for the creditor as follows:

1. Debtor(s) hereby acknowledge(s) that they are indebted to the creditor in the sum of \$ 6,997.74, and that they have no offset to this claim or any counterclaim that may be brought against the creditor.

2. Debtor(s) agree(s) to pay creditor the sum of \$ 6,997.74, together with interest at the rate of 9.000% per annum on the principal

balance of \$ 6,980.53 from 12/15/10 as follows:

a. \$

100.00 on 1/10/11. 100.00 on 2/10/11 and continuing monthly for 1 months thereafter at which time the entire settlement balance is due, unless otherwise renegotiated.

3. All checks should be sent to P.O. Box 550, Islandia, New York 11749

payable to RUBIN & ROTHMAN, as attorneys, and refer to file# 0914356.
4. Notwithstanding this stipulation, the debtor(s) understand that the creditor may at its sole discretion bring suit and enter judgment against them for the full amount due on this claim, including any interest, costs, disbursements and attorney's fees awarded by the court, crediting the debtor(s) with any payments made hereunder. Court costs and process server fees incurred in any future lawsuit will be added to the above balance. In the event that judgment is entered against the debtor(s), they agree to pay the amount of the judgment, together with interest at the rate of 9% per annum, in lieu of the aforesaid sum. The creditor will not enforce the judgment as long as payments are made in accordance with the terms of this stipulation. No representation has been made to the debtor(s) about whether the creditor will or will not bring suit against them. The above payments are the minimum amount due each month.

5. Upon payment by the debtor(s) in accordance with the terms of this stipulation, the creditor will issue a letter to debtor confirming that the matter was resolved if no lawsuit was brought. If the creditor commences a lawsuit, the creditor will notify the court that the case was settled or action discontinued. If a judgment was entered, the creditor will issue a satisfaction of judgment. Debtor(s) waive any cease and desist request.

Dated: Islandia, New York

12/15/2010

RUBIN & ROTHMAN, LLC Attorneys for Creditor

CHRIS PIERRE

WE ARE ATTEMPTING TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE. THIS COMMUNICATION IS FROM A DEBT COLLECTOR. NYC DCA LIC. 1249720 DO NOT FILE

RUBIN & ROTHMAN, LLC

NEW JERSEY OFFICE: 190 NORTH AVENUE EAST > 0. BOX 8 CRANFORD, N.J. 07016 FEL (908) 931-0017 FAX (908) 931-0660

MARY LACOSTE SPECTOR OF OPERATIONS

ATTORNEYS AT LAW
1787 VETERANS HIGHWAY SUITE 32
P.O. BOX 9003
ISLANDIA, N.Y. 11749
TEL (631) 234-1500

FAX (631) 234-1138 NYC DCA LIC. 1249720

June 16, 2011

JOSEPH RUBIN (1927-1994)
KEITH H. ROTHMAN'

ADAM V. ACUFF'
MARK BRAVERMAN'
SHARI BRAVERMAN'
JOSEPH LATONA'
SUBY MATHEW'
ERIC S. PILLISCHER'
SCOTT H. RUMPH'
ANGELO L. SIRAGUSA'
CHRISTOPHER VIRGA'
ELIZABETH T. VRACHNAS'
VALERIE E. WATTS'
DIANA K. ZOLLNER?

"MEMBER N.Y. BAR
"MEMBER N.J. BAR
"X REPLY TO N.Y. OFFICE
REPLY TO N.J. OFFICE

VIA EMAIL ONLY

CHRIS PIERRE 25 AUDUBON AVE HOLBROOK, NY 11741

CREDITOR: MIDLAND FUNDING LLC DOING BUSINESS

IN NY AS MIDLAND FUNDING OF DELAWARE LLC

DEBTOR: CHRIS PIERRE

OUR FILE NO: 914356 Index No: SMC 291-11

Dear Mr. Pierre:

As per our conversation, please find a proposed stipulation of settlement. Please review, and if acceptable, make two additional copies, and return all three original copies to my attention by mail. I will then return a fully signed original stipulation back to you by mail.

In addition, please fax a signed copy to my attention as soon as possible.

Should you have any questions or concerns, please contact me at extension 460. Thank you for your attention herein.

Very truly yours, RUBIN & ROTHMAN, LLC

Shari Braverman Esq.

Enc.

WE ARE ATTEMPTING TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE. THIS COMMUNICATION IS FROM A DEBT COLLECTOR.

RUBIN & ROTHMAN, LLC

NEW JERSEY OFFICE: 190 NORTH AVENUE EAST P.O. BOX 8 CRANFORD, N.J. 07016 TEL (908) 931-0017 FAX (908) 931-0660

MARY LACOSTE DIRECTOR OF OPERATIONS

ATTORNEYS AT LAW 1787 VETERANS HIGHWAY SUITE 32 P.O. BOX 9003 ISLANDIA, N.Y. 11749 TEL (631) 234-1500

FAX (631) 234-1138

NYC DCA LIC. 1249720

June 16, 2011

Ba 3/14 44200

VIA EMAIL ONLY

CHRIS PIERRE 25 AUDUBON AVE HOLBROOK, NY 11741

460

CREDITOR: MIDLAND FUNDING LLC DOING BUSINESS

IN NY AS MIDLAND FUNDING OF DELAWARE LLC

DEBTOR: CHRIS PIERRE

OUR FILE NO: 914356 Index No: SMC 291-11

Dear Mr. Pierre:

As per our conversation, please find a proposed stipulation of settlement. Please review, and if acceptable, make two additional copies, and return all three original copies to my attention by mail. I will then return a fully signed original stipulation back to you by mail.

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Should you have any questions or concerns, please contact me at extension 460. Thank you for your attention herein.

> Very truly yours, RUBIN & ROTHMAN, LLC

421

JOSEPH RUBIN (1927-1994)

KEITH H. ROTHMAN'

MARK BRAVERMAN'

SHARI BRAVERMAN'

JOSEPH LATONA'
SUBY MATHEW'
ERIC S. PILLISCHER'
SCOTT H. RUMPH'

ANGELO L. SIRAGUSA CHRISTOPHER VIRGA ELIZABETH T. VRACHNAS¹ VALERIE E. WATTS¹

X REPLY TO N.Y. OFFICE _ REPLY TO N.J. OFFICE

DIANA K. ZOLLNER² MEMBER N.Y. BAR MEMBER N.J. BAR

ADAM V. ACUFF1

Shari Braverman Esq.

Enc.

WE ARE ATTEMPTING TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE. THIS COMMUNICATION IS FROM A DEBT COLLECTOR.

File No. 914356
DISTRICT COURT OF THE COUNTY OF SUFFOLK
FOURTH DISTRICT: HAUPPAUGE

MIDLAND FUNDING LLC DOING BUSINESS IN NY AS MIDLAND FUNDING OF DELAWARE LLC

STIPULATION

Plaintiff,

Index No.: SMC 291-11

- against -

CHRIS PIERRE

Defendant.

IT IS HEREBY STIPULATED AND AGREED by and between the defendant and the attorneys for plaintiff that defendant's pending order to show cause, returnable June 20, 2011, and this matter are resolved as follows:

- 1. Defendant appears in this action and consents to the jurisdiction of the Court; and the judgment entered in the amount of \$ 6961.55 on 5/03/11 is hereby vacated pursuant to CPLR § 5015 (b), and a copy of this stipulation may be filed with the Clerk of the Court or County Clerk by either side without further notice.
 - 2. Defendant agrees to pay plaintiff the sum of \$5,000.00 as follows:

\$100.00 on August 1, 2011 and continuing monthly at that amount with payments due on the same day of each month until the full amount is paid.

- 3. Payments shall be made to the order of RUBIN & ROTHMAN, as attorneys, 1787 Veterans Highway, P.O. Box 550, Islandia, New York 11749 and refer to file No. 914356.
- 4. Plaintiff agrees to withhold the entry of judgment as long as payments are made in accordance with the terms of this stipulation. In the event defendant fails to make the payments due hereunder for ten (10) days after the due date, plaintiff may proceed with the entry of judgment for the full amount claimed in the complaint, together with interest, costs, disbursements, crediting defendant with any payments made hereunder. Defendant hereby discontinues with prejudice any counterclaims that they may have against plaintiff.
- 5. Upon payment by defendant in accordance with the terms of this stipulation, plaintiff will issue a stipulation discontinuing action.
 - 6. Defendant hereby withdraws his pending order to show cause.
- 7. A fully executed faxed copy of this stipulation shall be deemed to be an original.

Dated:

CHRIS PIERRE

Defendant

RUBIN & ROTHMAN, LLC Attorneys for Plaintiff

1787 Veterans Highway, P.O. Box 9003

Islandia, New York 11749

(631) 234-1500

By:

Shari Braverman, Esq.

MEMO

TO CHRIS PIERRE 25 AUDUBON AVE HOLBROOK, NY 11741

FROM:

RUBIN & ROTHMAN, LLC 1787 Veterans Highway P.O. Box 550 Islandia, New York 11749 631-234-1500

DATED:

June 20, 2011

CREDITOR: MIDLAND FUNDING LLC DOING BUSINESS

IN NY AS MIDLAND FUNDING OF DELAWARE, LLC

DEBTOR: CHRIS PIERRE

Our File No. 914356

Enclosed please find duly executed stipulation, an original of which has been forwarded to the court for filing.

RUBIN AND ROTHMAN /dac Enc.

WE ARE ATTEMPTING TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE. THIS COMMUNICATION IS FROM A DEBT COLLECTOR.

NYC DCA 1249720

File Nr'. 914356 DISTRICT COURT OF THE COUNTY OF SUFFOLK FOURTH DISTRICT: HAUPPAUGE

MIDLAND FUNDING LLC DOING BUSINESS IN NY AS MIDLAND FUNDING OF DELAWARE LLC

Plaintiff.

STIPULATION

Index No.: SMC 291-11

- against -

CHRIS PIERRE

Defendant.

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\$100.00 on August 1, 2011 and continuing monthly at that amount with payments due on the same day of each month until the full amount is paid.

- 3. Payments shall be made to the order of RUBIN & ROTHMAN, as attorneys, 1787 Veterans Highway, P.O. Box 550, Islandia, New York 11749 and refer to file No. 914356.
- 4. Plaintiff agrees to withhold the entry of judgment as long as payments are made in accordance with the terms of this stipulation. In the event defendant fails to make the payments due hereunder for ten (10) days after the due date, plaintiff may proceed with the entry of judgment for the full amount claimed in the complaint, together with interest, costs, disbursements, crediting defendant with any payments made hereunder. Defendant hereby discontinues with prejudice any counterclaims that they may have against plaintiff.
- 5. Upon payment by defendant in accordance with the terms of this stipulation, plaintiff will issue a stipulation discontinuing action.
 - 6. Defendant hereby withdraws his pending order to show cause.

7. A fully executed faxed copy of this stipulation shall be deemed to be an original.

Dated:

6/7-1 RUBIN & ROTHMAN, LLC Attorneys for Plaintiff

1787 Veterans Highway, P.O. Box 9003

Islandia, New York 11749

(631) 234-1500

CHRIS PIERRE

Defendant

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JUN 1 7 2011

RUBIN & ROTHMAN, LLC

Shari Braverman, Esq.

P1-CP-0019